

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Humboldt River Field Office (HRFO) Winnemucca District (WD).

TRACKING NUMBER: **DOI-BLM-NV-W000-2012-0059-DNA**

CASEFILE/PROJECT NUMBER: Refer to parcel numbers listed on the attached list of legal descriptions

PROPOSED ACTION TITLE/TYPE: Geothermal Lease Parcel Nominations for January 29, 2013 Lease Sale

LOCATION/LEGAL DESCRIPTION: See attached general and site vicinity maps and list of legal descriptions

APPLICANT (if any): Nevada BLM

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

The Proposed Action is to review two (2) nominated geothermal parcels associated with the Paradise-Denio MFP. These two (2) geothermal parcels are part of a package of four (4) nominated geothermal parcels nominated for the January 2013 lease sale that are being evaluated by the WD. The 2 geothermal parcels are being reviewed against the existing National Environmental Policy Act (NEPA) documents as identified in part C of this worksheet to determine if these parcels are open for leasing in the WD. This review includes identifying any potential impacts and the appropriate stipulations that would be made a part of any subsequent Offer to Lease for Geothermal Resources (for new leases issued under the Energy Policy Act of 2005). Lease issuance alone does not authorize any ground-disturbing activities to explore for or develop geothermal resources without site-specific approval for the intended operation. Such approval could include additional environmental reviews and permits.

A determination has been made that these parcels are open for leasing subject to both general stipulations that would apply to all lease parcels within the WD as well as applicable site specific stipulations. These stipulations are attached and made a part of this worksheet.

B. Land Use Plan (LUP) Conformance

- 1) BLM WDO Paradise-Denio Management Framework Plan (MFP) approved 1982. All parcels being evaluated in this DNA are subject to this MFP.

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

Paradise-Denio MFP Objective M-6:

“Make energy available on public lands on a managed and controlled basis, consistent with national energy policies and demands.”

Paradise-Denio MFP III Minerals 6.6

The Paradise-Denio Resource Area will be open to geothermal and oil and gas leasing with the following stipulations:

Noncompetitive areas and all Known Geothermal Resource Areas (KGRAs) or portions thereof within the resource area will be offered for lease except for those which are areas of significant environment conflict or have historical and/or cultural significance.

The following area meets the above criteria and will not be leased:

Pine Forest Vehicle Closure Area

No surface occupancy will be allowed on the following:

1. Sage grouse strutting grounds
2. Osgood Mountain milk-vetch area
3. Raised bog
4. S-1 cultural and historic sites

The following areas will be leased with special stipulations:

Critical wildlife habitat areas

- 2) Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States, Record of Decision and Resource Management Plan Amendments for Geothermal Leasing in the Western United States, dated, December 2008 (2008 PEIS). This ROD Amends the Paradise-Denio MFP and applies to all parcels being evaluated in this DNA.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

1. EA# NV-020-02-029 "Winnemucca Field Office Geothermal Resources Leasing Programmatic Environmental Assessment", Decision Record/Finding of No Significant Impact (DR/FONSI) dated, September 10, 2002 and modification DR/FONSI dated September 13, 2002.
2. Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States, Record of Decision and Resource Management Plan Amendments for Geothermal Leasing in the Western United States, dated, December 2008 (2008 PEIS).

In previous lease sale evaluations, stipulations associated with these two NEPA documents and Decisions were clarified. Some of these clarified stipulations are utilized in this evaluation. Additionally, during the January 2012 lease sale evaluations, stipulations associated with these two NEPA documents and Decisions were further clarified. These clarified stipulations are also utilized in this evaluation.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Thirteen Potentially Valuable Areas (PVAs) were identified and analyzed in EA# NV-020-02-029.

Both of these parcels are within an identified PVA as listed below:

PVA	Parcel Number
1	NV-13-01-004
1	NV-13-01-005

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes. The nominated geothermal parcels were reviewed with respect to the range of alternatives analyzed in the existing NEPA documents.

The proposed action and the No Action Alternative were the two alternatives analyzed in EA NV-020-02-029. The proposed action was to consider leasing all or some of the

geothermal resources within thirteen (13) Potentially Valuable Areas (PVAs) and Known Geothermal Resource Areas within the jurisdiction of the WD and a portion of the Stillwater Field Office. Under the No Action Alternative, pending leases would be analyzed under a previous EA that did not include PVAs or KGRAs and would result in additional NEPA analysis on a case by case basis.

The 2008 PEIS identified three alternatives:

- Alternative A- No Action: Continuation of Current Management
- Alternative B- Proposed Action and Amendments
- Alternative C- Leasing Lands near Transmission Lines

Alternative B was selected as the proposed plan amendment based on: (1) its consistency with the requirements of the Energy Policy Act of 2005, (2) its balanced use and protection of resources, (3) the Final PEIS's analysis of potential environmental impacts, and (4) the comments and recommendations from agencies, states, stakeholders, and the public. Alternative B is structured to be consistent with the congressional mandate of the Energy Policy Act to facilitate geothermal leasing by amending land use plans to allocate geothermal resources and adopt stipulations and procedures for leasing.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes. A review of the proposed parcels did not result in the finding of any new information or circumstances and it can be reasonably concluded that new information and new circumstances would not substantially change the analysis.

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes. Both documents state there would be no direct impacts to issuing leases for future geothermal exploration, development, and production activities. Indirect impacts and cumulative effects to resources were considered in the "reasonably foreseeable development scenario". The indirect effects of allowing these nominated parcels to be leased are within the range of the reasonably foreseeable development scenarios identified in both NEPA documents.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Yes. EA# NV-020-02-029 was made available for a 30 day public comment period via Dear Interested Party letters and news releases. Comments were taken into consideration prior to the final EA and FONSI/DR.

The 2008 PEIS was made available for a 90-day public comment period and held 13 public meetings in the 12-western states project area prior to issuing the Record of Decision.

In addition, the Nevada Department of Wildlife and the following Native American Tribes were consulted regarding this proposal:

- Fort McDermitt Paiute & Shoshone Tribe
- Lovelock Paiute Tribe
- Pyramid Lake Paiute Tribe
- Summit Lake Paiute Tribe
- Winnemucca Indian Colony
- Reno-Sparks Indian Colony
- Battle Mountain Band Council
- Fallon Paiute and Shoshone Tribe
- Burns Paiute Tribal Council
- Cedarville Rancheria
- Fort Bidwell Indian Community Council

E. Persons/Agencies/BLM Staff Consulted

See Attached Section E for Review Signatures and Conclusion